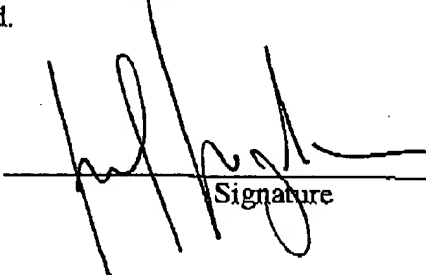
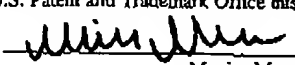


Modified PTO/SB/33 (10-05)

| PRE-APPEAL BRIEF REQUEST FOR REVIEW | | Docket Number | |
|---|------------------------|---|--|
| | | CQ10195 | |
| Mail Stop AF Commissioner for Patents P.O. Box 1450 Alexandria, VA 22313-1450 | Application Number | Filed | |
| | 09/733,894 | December 12, 2000 | |
| | First Named Inventor | | |
| | Elizabeth F. CHURCHILL | | |
| | Art Unit | Examiner | |
| | 2157 | Hussein A. EL CHANTI | |
| MOUNTAIN VIEW OFFICE 23493 CUSTOMER NUMBER | | | |
| Applicants request review of the final rejection in the above-identified application. No amendments are being filed with this request. | | | |
| This request is being filed with a notice of appeal | | | |
| The review is requested for the reasons(s) stated on the attached sheet(s). Note: No more than five (5) pages may be provided. | | | |
| <input checked="" type="checkbox"/> I am an attorney or agent of record. | | | |
| Registration number | | 48,205 | |
| | |  | |
| | | Signature | |
| | | Pavel I. Pogodin | |
| | | Typed or printed name | |
| | | (650) 625-8100 | |
| | | Telephone number | |
| | | February 8, 2007 | |
| | | Date | |
| CERTIFICATE OF FACSIMILE TRANSMISSION | | | |
| I hereby certify that this PRE-APPEAL BRIEF REQUEST FOR REVIEW is being facsimile transmitted to the U.S. Patent and Trademark Office this 8 th day of February, 2007. | | | |
| | |  | |
| | | Monica Moreno | |

RECEIVED
CENTRAL FAX CENTER

FEB 08 2007

PATENT APPLICATION

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re application of

Docket No: CQ10195

Elizabeth F. CHURCHILL, et al.

Appln. No.: 09/733,894

Group Art Unit: 2157

Confirmation No.: 5464

Examiner: Hussein A. EL CHANTI

Filed: December 12, 2000

For: SYSTEMS AND METHODS FOR SUPPORTING DOCUMENT CENTERED
DISCUSSION ACROSS HETEROGENEOUS DEVICES AND DISPLAYS

PRE-APPEAL BRIEF REQUEST FOR REVIEW

MAIL STOP AF - PATENTS

Commissioner for Patents

P.O. Box 1450

Alexandria, VA 22313-1450

Sir:

Pursuant to the new Pre-Appeal Brief Conference Pilot Program, and further to the Examiner's Final Office Action dated September 8, 2006, Applicants file this Pre-Appeal Brief Request for Review. This Request is also accompanied by the filing of a Notice of Appeal.

Applicants turn now to the rejections at issue. Specifically, claim 1 recites two separate and distinct elements: (1) invitation information regarding invitations to join at least one document-centered discussion comprising identities of entities invited to join the at least one discussion and (2) information on each conference participant (which is part of the view information). Claim 4 includes generally similar limitations. The Examiner attempts to improperly read the information on actual conference participants stored by Salesky et al. on both of the above limitations (1) and (2) at the same time.

Attorney Docket No. CQ10195
PATENT APPLICATION

PRE-APPEAL BRIEF REQUEST FOR REVIEW
U.S. Application No. 09/733,894

In the Advisory Action dated December 21, 2006, the Examiner stated that the aforesaid element (1) is described at col. 30, lines 20-46 of Salesky et al. Specifically, the Examiner stated that Salesky et al. teaches storing identities of users that are invited to join the conference after the user tries to access the presentation. In fact, in the relevant portion identified by the Examiner, Salesky et al. teaches that “”. In this regard, Applicants respectfully submit that what Salesky et al. describes in the referenced portion is information on actual conference participants who have actually connected to the conference server and signed in (authenticated themselves) using the secret conference key. Applicants respectfully submit that the information about people who actually signed in into the conference is not the claimed invitation information but corresponds to the above claim element (2), which is information on each conference participant.

The aforesaid element (1), which is completely separate and distinct from the element (2), is never disclosed by Salesky et al. Specifically, Salesky et al. never mentions the claimed invitation storage memory and does not disclose the invitation information regarding invitations to join at least one document-centered discussion comprising identities of entities invited to join the at least one discussion. In the Advisory Action, the Examiner continues to improperly read the claimed invitation information (1) on the Salesky et al.’s storing the identities of the users who actually joined the conference. Applicants respectfully submit that this is not correct. Specifically, Salesky et al. stores the user’s identity after the user actually joined the meeting. Salesky et al. never specifies how such user has been invited to the meeting. The Examiner unjustifiably assumes, without finding any support in Salesky et al., that each such user has been automatically invited by the system. However, it is a common practice for conference organizers

Attorney Docket No. CQ10195
PATENT APPLICATION

PRE-APPEAL BRIEF REQUEST FOR REVIEW
U.S. Application No. 09/733,894

to manually send invitation information to prospective participants via email, inviting them to join the conference and giving them electronic conference location and password information. In this commonly occurring scenario, the conference system will have no information what so ever on the invited conference participants. Thus, storing identities of the invited users is neither disclosed nor inherent in Salesky et al.

In fact, Salesky et al. teaches that the key for the meeting is specified by the meeting manager and that "potential new conferee client sends a request to join the meeting, and then supplies the key for the meeting that the potential conferee obtained previously," see Salesky et al. col. 30, lines 26-35. It seems well conceived that the potential meeting participant obtains the key directly from the meeting manager. Thus, there is simply nothing in Salesky et al. that would indicate that the identities of invited entities are necessarily stored by the conference system. The fact that the prior art system may or may not operate as alleged by the Examiner is not sufficient to establish anticipation under 35 U.S.C. 102.

Thus, what Salesky et al. actually teaches in the aforesaid portions specified by the Examiner, is information on each conference participant, which is a completely separate claim element from the invitation information regarding invitations to join at least one document-centered discussion comprising identities of entities invited to join the at least one discussion. Thus, the aforesaid claim element (1) is never disclosed by Salesky et al.

Further, in the Final Office Action, the Examiner stated that the alleged teaching appears at 18, ln. 12-26 and col. 1, ln 65 to col. 2 ln. 7. Applicants carefully examined the cited portions of Salesky et al. but could not find any alleged teaching. None of the above portions of Salesky

Attorney Docket No. CQ10195
PATENT APPLICATION

PRE-APPEAL BRIEF REQUEST FOR REVIEW
U.S. Application No. 09/733,894

et al. contain any description of the claimed invitation information regarding invitations to join at least one document-centered discussion including identities of entities invited to join the at least one discussion.

The Examiner further indicated that because the system of Salesky et al. verifies whether the user of the client software is authorized to join a meeting (see Salesky et al. col. 18, ln. 19-20), the system of Salesky et al. has to store the identities of the invited users. As Applicants stated before, such interpretation of Salesky et al. is improper. Specifically, storing user's identities is not inherently necessary for verifying whether a user is authorized to join a conference. Such verification could be completed using a single password which is manually provided to all authorized users via email by the conference manager. At col. 2, ln. 8-15 Salesky et al. specifically teaches generating such a password key. If the user possesses the aforesaid password key, the user could be authorized to join the conference without storing user's identity. Therefore, the Examiner's argument that Salesky et al. has to store identities of the invited users is misplaced.

The Examiner yet further stated that storing identities of all the meeting participants is the same as storing the identities of invited users. Applicants respectfully submit that this is not the case. First of all, storing the identities of the participating users are covered by a completely separate claim element (2). Second, users could be invited manually by the meeting manager and some of the invited users may not actually join the conference. In other words, the invitation information comprising identities of entities invited to join the at least one discussion is entirely

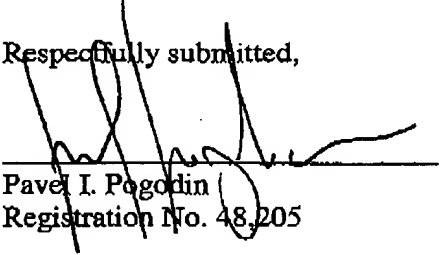
Attorney Docket No. CQ10195
PATENT APPLICATION

PRE-APPEAL BRIEF REQUEST FOR REVIEW
U.S. Application No. 09/733,894

different from identities of all the meeting participants. Salesky et al. never talks about invitations to join a meeting or about storing the identities of the invited users.

In addition, Salesky et al. fails to teach or suggest the view storage memory, which stores view information for each active document-centered discussion, comprising information on each conference participant, which is specifically recited in the amended claims 1 and 4. The Examiner alleges that the aforesaid limitation reads on the conference server storing information regarding scheduled and live presentations, see Final Office Action at page 3. Applicants respectfully disagree. Specifically, the schedule and live presentation information of Salesky et al. does not include the information on each conference participant. In other words, in Salesky et al. the information on conference participants is not part of the view information. The above deficiencies of Salesky et al. provide another reason for patentability of claims 1 and 4 over Salesky et al.

Respectfully submitted,


Pavel I. Pogodin
Registration No. 48,205

SUGHRUE MION, PLLC
Telephone: (650) 625-8100
Facsimile: (650) 625-8110

MOUNTAIN VIEW OFFICE

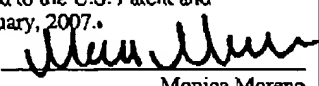
23493

CUSTOMER NUMBER

Date: February 8, 2007

CERTIFICATE OF FACSIMILE TRANSMISSION

I hereby certify that this PRE-APPEAL BRIEF REQUEST FOR REVIEW is being facsimile transmitted to the U.S. Patent and Trademark Office this 8th day of February, 2007.


Monica Moreno